

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In Re:	:	Bankruptcy No. 18-16779-AMC
Craig R. Fulton	:	Chapter 13
Debtor	:	
	:	
First Guaranty Mortgage Corporation c/o	:	
Rushmore Loan Management Services, LLC	:	
Movant	:	
vs.	:	
	:	
Craig R. Fulton and Erneyka Fulton (Non-	:	
filing Co-Debtor)	:	
Debtor/Respondent	:	
	:	
and	:	
	:	
William C. Miller, Esquire	:	
Trustee/Respondent	:	

**NOTICE OF MOTION, RESPONSE
DEADLINE AND HEARING DATE**

First Guaranty Mortgage Corporation c/o Rushmore Loan Management Services, LLC has filed with the US Bankruptcy Court a Motion for Relief from Stay regarding its rights it has under the mortgage or with respect to the property located at: 168 Sparks Street, Philadelphia, PA 19120.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult with an attorney.)

1. If you do not want the Court to grant the relief sought in the motion or if you want the court to consider your views on the motion, then on or before **09/24/2020** you or your attorney must do all of the following things:

(a) **FILE AN ANSWER** explaining your position at:

United States Bankruptcy Court
Robert N.C. Nix Building
900 Market Street, Suite 400
Philadelphia, PA 19107-4299

If you mail your answer to the Bankruptcy Court Clerk's Office for filing, you must mail is early enough so that it will be received on or before the date stated above; **and**

(b) **MAIL A COPY** of the documents to the Movant's attorney:

Bradley J. Osborne, Esq.
Hladik, Onorato & Federman, LLP
298 Wissahickon Avenue
North Wales, PA 19454
Phone 215-855-9521
Fax 215-855-9121
Email: bosborne@hoflawgroup.com

2. If you or your attorney do not take these steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the court may enter an order granting the relief requested in the motion.

3. A **HEARING ON THE MOTION** is scheduled to be held before the Hon. Ashely M. Chan on **09/29/2020** at **02:00 PM** in Courtroom No. **#4** United States Bankruptcy Court, Robert N.C. Nix Federal Building, 900 Market Street, 2nd Floor, Philadelphia, PA 19107.

4. If a copy of the Motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).

5. You may contact the Bankruptcy Court Clerk's office at (215) 408-2800 to find out whether the hearing has been canceled because no one filed an answer.